

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NATALIA SUTHERLAND and MARIA)
SUTHERLAND, as Surviving Children of)
ANDREW REED SUTHERLAND, Decedent,)

Plaintiffs,)

v.)

BUTTS COUNTY, GEORGIA; BUTTS)
COUNTY SHERIFF'S OFFICE; GARY)
LONG, in his Individual and Official)
Capacities; JOSEPH MANNING, in his)
Individual and Official Capacities;)
ANTHONY DUPREE, in his Individual)
Official Capacities; TERRY SMITH, in his)
Individual and Official Capacities; EMMETT)
LEWIS, in his Individual and Official)
Capacities; KALEB HILL, in his Individual)
and Official Capacities; CALEB BROOKS,)
in his Individual and Official Capacities;)
BRANDON BOYD, in his Individual and)
Official Capacities; CHRISTIN MILLER,)
in her Individual and Official Capacities;)
ANTONIO LEE, in his Individual and)
Official Capacities; CONSTANCE ADAMS,)
in her Individual and Official Capacities;)
SOUTHERN HEALTH PARTNERS, INC.;)
AMANDA ALLEN, in her Individual and)
Official Capacities; and NETANYA)
SAWYER, in her Individual and Official)
Capacities; and JOHN DOE(S) 1-10,)

Defendants.)

CIVIL ACTION FILE NO.:

JURY TRIAL DEMANDED

CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT

(1) The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

Natalia Sutherland; Maria Sutherland; Butts County, Georgia; Butts County Sheriff's Office; Gary Long; Joseph Manning; Anthony Dupree; Terry Smith; Emmett Lewis; Kaleb Hill; Caleb Brooks; Brandon Boyd; Christin Miller; Antonio Lee; Constance Adams; Southern Health Partners, Inc.; Amanda Allen; Netanya Sawyer; and John Doe(s) 1-10

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

Natalia Sutherland; Maria Sutherland; Butts County, Georgia; Butts County Sheriff's Office; Gary Long; Joseph Manning; Anthony Dupree; Terry Smith; Emmett Lewis; Kaleb Hill; Caleb Brooks; Brandon Boyd; Christin Miller; Antonio Lee; Constance Adams; Southern Health Partners, Inc.; Amanda Allen; Netanya Sawyer; and John Doe(s) 1-10

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

Clayton Cain and Dustin Davies

(4) [For every action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a).] The undersigned further certifies that the following is a full and complete list of the citizenship* of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

Natalia Sutherland (Maryland); Maria Sutherland (Maryland); Butts County, Georgia (Georgia); Butts County Sheriff's Office (Georgia); Gary Long (Georgia); Joseph Manning (Georgia); Anthony Dupree (Georgia); Terry Smith (Georgia); Emmett Lewis (Georgia); Kaleb Hill (Georgia); Caleb Brooks (Georgia); Brandon Boyd (Georgia); Christin Miller (Georgia); Antonio Lee (Georgia); Constance Adams (Georgia); Southern Health Partners, Inc. (Delaware); Amanda Allen (Georgia); Netanya Sawyer (Georgia); and John Doe(s) 1-10 (Georgia)

*Allegations of an individual's residence do not enable the Court to determine an individual's citizenship. *Travaglio v. Am. Express Co.*, 735 F.3d 1266, 1269 (11th Cir. 2013). For purposes of diversity jurisdiction, citizenship is equivalent to domicile, which is a party's "true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." *McCormick v. Aderholt*, 293 F.3d 1254, 1257-58 (11th Cir. 2002) (quoting *Mas v. Perry*, 489 F.2d 1396, 1399 (5th Cir. 1974)).

"[A] limited partnership is a citizen of each state in which any of its partners, limited or general, are citizens." *Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C.*, 374 F.3d 1020, 1021 (11th Cir. 2004) (citing *Carden v. Arkoma Assocs.*, 494 U.S. 185, 195-196 (1990)).

A limited liability company, like other unincorporated entities, "is a citizen of any state of which a member of the company is a citizen." *Rolling Greens MHP*, 374 F.3d at 1022.

A traditional trust is a citizen of the state of which its trustee is a citizen, not its beneficiaries. *Alliant Tax Credit 31, Inc. v. Murphy*, 924 F.3d 1134, 1143 (11th Cir. 2019).

Submitted this 21st day of April, 2023.

Counsel for Plaintiffs Natalia Sutherland and Maria Sutherland

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